REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of June 14, 2006 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Office is expressly authorized to charge any deficiencies and credit any overpayments to Deposit Account No. 50-0951.

Claims 1, 8, 11, 14, and 17 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,424,976 to Jarvis, *et al.* (hereinafter Jarvis). Claims 2-7, 9, 10, 12, 13, 15, 16, 18, and 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Jarvis, in view of U.S. Patent No. 6,302,326 to Symonds, *et al.* (hereinafter Symonds).

Applicants initially wish to express their sincere appreciation for the Examiner's thoughtful response to Applicants' previous submission. Applicants have formulated this response, in which independent Claims 1, 8, 11, 14, and 17 have been amended, in the context of the remarks made at page 2 of the Office Action. Dependent Claims 4, 5, 10, 13, 16, and 19 have been amended to maintain consistency with each of the claims. Claims 3, 9, 12, 15, and 18 have been cancelled. As discussed below, the claims amendments presented herein are fully supported throughout the Specification. No new matter has been introduced.

Applicants' Invention

It may be useful at this juncture to reiterate certain aspect of Applicants' invention. One embodiment of the invention, exemplified by amended Claim 1, is a routing system for routing data repository messages. The system can include a plurality of computer systems, each of which has a data repository for storing data according to a different syntax. The system further can include a message router in communication with, and

remotely located from, each of the plurality of computer systems. (See, e.g., Specification, p. 7, lines 11-21, and p. 8, lines 14-24; see also FIG. 1.)

The message router can include a conversion engine that translates content in a received data repository message. The conversion effected by the conversion engine can convert from a syntax corresponding to a data repository message of an originating computer system to a syntax corresponding to a data repository of at least one target computer system. Additionally, the message router can include a translation library configured to store information for converting each of the different syntaxes into each other of the different syntaxes. (See, e.g., Specification, p. 11, lines 3-26; see also FIG. 3.)

The Claims Define Over The Prior Art

Independent Claims 1, 8, 11, 14, and 17 were each rejected as being anticipated by Jarvis. Jarvis "provides a system and method for implementing a forward compatibility syntax in a directory services environment." (Col. 2, lines 40-43.) As explicitly described in the reference, communication involving disparate syntaxes in Jarvis requires that each the communicating computer systems "understand and convert" a common syntax, namely, the forward compatibility (FC) syntax:

> "The first component involves taking an attribute according to a new syntax that is supported by newer servers, but not by older servers and separating data with respect to which referential integrity is not a concern (hereinafter "blob data") from data with respect to which referential integrity is a concern (hereinafter Distinguished Names ("DNs")), and recombining the two types of data according to a forward compatibility ("FC") syntax that is supported by both older and newer servers. The second component involves

the recognition that only certain, i.e., newer, servers understand and convert between the FC syntax and the actual new syntax, while the older servers just handle the FC syntax without actually needing to understand it." (Col. 2, lines 44-57.)

Moreover, as emphasized throughout the reference, Jarvis operates by taking data attributes based on a new syntax supported by newer systems, though not by older ones, separates data whose "referential integrity" is contextually unimportant, and "recomb[ines] the two types of data according to [the] forward compatibility ('FC') syntax that is supported by both the newer and older servers." (Col. 2, lines 44-52; see also Col. 3, line 62 – Col. 4, line 6.) (Emphasis Supplied.)

It follows that Jarvis requires that each communicating computer system, both the one originating a message and the one receiving the message, first convert to a commonly understood syntax, the FC syntax. Moreover, in Jarvis, it is the originating server that converts the data into the FC syntax that is commonly understood by both the originating and receiving server. With Jarvis, whenever data is sent by the originating server it has already been translated into the common FC syntax.

Jarvis' approach precludes Jarvis from providing the advantages provided by Applicants' invention. Jarvis does not allow one computer system to send a message in one syntax and be received by a different computer system in a context that the latter system understands. Jarvis does not provide a message router that is interposed between two different computer systems and that converts the syntax of a message from one computer system into the syntax of the other before the message sent by the former is received by latter.

Specifically, Jarvis does not expressly or inherently teach a message router in communication with, and remotely located from, different computer system, let alone one

having a conversion engine to translate messages from one syntax to another, as expressly recited in Claims 1, 8, 11, 14, and 17. Each of the claims expressly recites that the conversion engine translates content in a received data repository message from a syntax corresponding to a data repository of an originating computer system to a syntax corresponding to a data repository of a target computer system. Jarvis fails to teach, either expressly or inherently, this feature.

Jarvis, moreover, fails to expressly or inherently teach a message router that includes a translation library configured to store information for converting each of a plurality of different syntaxes into each other of the different syntaxes, as also recited in Claims 1, 8, 11, 14, and 17. Jarvis, indeed, has no need for such a translation library, because, as already noted, Jarvis requires that different computer systems share a common syntax, the FC syntax.

Certainly the other reference cited, Symonds, does not provide the features lacking in Jarvis. Symonds is explicitly directed to financial transaction processing. Symonds addresses format conversions. But formatting is wholly distinct from syntax, and Symonds is entirely silent regarding syntax and syntax conversions.

It thus follows that Jarvis fails to expressly or inherently teach every feature recited in Claims 1, 8, 11, 14, and 17. Moreover, Symonds fails to teach or suggest every feature lacking in Jarvis. Accordingly, Applicants respectfully submit that Claims 1, 8, 11, 14, and 17 define over the prior art. Applicants further respectfully submit that whereas the remaining claims each depend from one of Claims 1, 8, 11, 14, or 17 while reciting additional features, the remaining claims likewise define over the prior art.

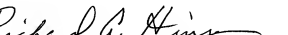
CONCLUSION

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the

undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: September 14, 2006



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